

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MAHMOUD KHALIL,

Petitioner,

V.

WILLIAM P. JOYCE, *et al.*,

Respondents.

NO. 25 CIV. 1935 (JMF)

DECLARATION OF FIELD OFFICE DIRECTOR
MELLISSA HARPER

DECLARATION OF FIELD OFFICE DIRECTOR MELLISSA HARPER

I, Mellissa Harper, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am employed by U.S. Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”), and currently serve as Field Office Director (“FOD”) at the New Orleans Field Office. I have held this position since November 20, 2022. I have been employed by ICE, and the former Immigration and Naturalization Service, in various capacities since September 23, 2001.
2. In my current position, I oversee several aspects of the immigration enforcement process, including the identification and arrest, transportation, detention, case management, and removal of noncitizens. In this capacity, I manage ERO personnel and provide oversight over a number of detention facilities within the New Orleans Field Office, including the Central Louisiana ICE Processing Center (“CLIPC”) in Jena, Louisiana.
3. I am aware that Mahmoud Khalil (“Khalil”) has filed a Petition for a Writ for Habeas Corpus before this Court.

4. The CLIPC permits legal representatives to visit their clients, in-person, telephonically, and virtually. Detainees have access to telephones and tablets. The tablets can be used to conduct phone or video calls from the housing units. Generally, these calls are recorded.
5. However, legal representatives may register with Talton, the tablet communication service provider, to request tablet communication that is not recorded. Additional information on legal visitation is located on the ICE website at <https://www.ice.gov/detain/detention-facilities/central-louisiana-ipc>. Legal representatives can also utilize the Virtual Attorney Visitation (“VAV”), which allows legal representatives to meet with their clients virtually using video technology in private rooms or booths to ensure confidentiality of communications during remote legal visits. At the CLIPC, the VAV is comprised of soundproof booths. Additional VAV information is located on the ICE website at <https://www.ice.gov/detain/detention-facilities/vav>. For any legal call, the legal representative may contact the CLIPC facility directly to schedule a call at (318) 992-7899 or visitrequest@geogroup.com.
6. Generally, legal representatives can schedule legal visits seven days a week from 6:00 a.m. to 11:00 p.m Central Time. However, legal representatives may reach out to the facility directly where a legal visit is requested outside of the normal hours.
7. The CLIPC permits the detainee to communicate telephonically and virtually with family and friends. Detainees have access to telephones and tablets. The tablets can be used to conduct phone or video calls from the housing units. Generally, these calls are recorded. Additional information on detainee communication is located on the ICE website at <https://www.ice.gov/detain/detention-facilities/central-louisiana-ipc>.
8. Immigration court hearings at the CLIPC are conducted virtually via WebEx and in-person.

9. At the CLIPC, ERO can make arrangements to produce a detainee virtually via WebEx or Microsoft Teams for an appearance in federal court.
10. ICE and ERO are fully committed to ensuring Khalil has access to attorney-client privileged calls with his legal representatives while detained at CLIPC.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of March, 2025.

**MELLISSA B
HARPER**

Digitally signed by
MELLISSA B HARPER
Date: 2025.03.14 12:08:14
-05'00'

Melissa Harper
Field Office Director
New Orleans Field Office
Enforcement & Removal Operations
U.S. Immigration and Customs Enforcement